## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TENNESSEE WESTERN DIVISION

**UNITED STATES OF AMERICA** 

Plaintiff,

v. No. 2:20-CR-20090-MSN

**SHANE SONDERMAN** 

Defendant.

## **MOTION FOR EXTENSION OF TIME**

COMES NOW Shane Sonderman, Defendant, by and through his attorneys HMRS Attorneys, pursuant to Fed. R. Crim. P. 45 and for his Motion for Extension of Time states:

- 1. Defendant was charged in the above-entitled action by Criminal Complaint on May 4, 2020. (Docket Entry ("D.E.") 1). Defendant was arraigned on May 5, 2020, with the probable cause hearing set for May 11, 2020. (D.E. 6)
- 2. Pursuant to the Scheduling Order entered by the Court (D.E. 27), all pretrial motions filed by Defendant are due by October 7, 2020. The time to file such motions has not yet expired.
- 3. Fed. R. Crim. P. 45(b) provides the Court on motion of a party, before the originally prescribed time expires, may for good cause extend the times set forth in the Scheduling Order.
- 4. Due to his trial schedule, other motions practice, and other scheduling conflicts, counsel for Defendant has not had the opportunity to fully consult with his client,

or to adequately research the issues raised by the discovery. Therefore, Defendant respectfully requests an extension of time, up to and including fourteen (14) days, within which to file pretrial motions.

- 5. Defendant's counsel has contacted the Assistant United States Attorney in accordance with the Local Rules, and she has no objection.
  - 6. Defendant does not file this Motion for the purpose of harassment or delay.

WHEREFORE, Defendant prays for an Order allowing an extension of time, up to and including fourteen (14) days to October 21, 2020, within which to file Defendant's pretrial motions, and for all other proper relief..

Respectfully submitted SHANE SONDERMAN

By: /s/ Bryan R. Huffman
Bryan R. Huffman, BPR No. 030050
Attorney for Defendant
HUFFMAN MASON, PLLC
P.O. Box 944
Covington, TN 38019
(901) 726-3854
(901) 726-3539 (Facsimile)

## **Certificate of Service**

I, Bryan R. Huffman, hereby certify that on this 7th day of October, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will provide notification of such filing to the following:

Debra Lynn Ireland UNITED STATES ATTORNEY'S OFFICE 167 N. Main St. Suite 800 Memphis, TN 38103 901-544-4231 901-544-4230 (Facsimile) deb.ireland@usdoj.gov

/s/ **Bryan R. Huffman**